

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: Bard IVC Filters) MD-15-02641-PHX-DGC
Products Liability Litigation)
) Phoenix, Arizona
) May 30, 2018
)
Doris Jones, an individual,)
)
Plaintiff,)
) CV-16-00782-PHX-DGC
v.)
)
C.R. Bard, Inc., a New Jersey)
corporation; and Bard Peripheral)
Vascular, Inc., an Arizona)
corporation,)
)
Defendants.)
)

BEFORE: THE HONORABLE DAVID G. CAMPBELL, JUDGE

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TRIAL DAY 10 - A.M. SESSION

(Pages 2131 - 2265)

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Proceedings Reported by Stenographic Court Reporter
Transcript Prepared with Computer-Aided Transcription

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DIRECT EXAMINATION - MICHAEL RANDALL

1 on this. There was an advancement in technology.

2 Q And did you plan to do a clinical trial involving the
3 Denali filter?

4 A Yes.

5 Q Did that ultimately come to pass?

6 A Yes.

7 Q Mr. Randall, let me ask you this: The case that we're
8 here for today involves an Eclipse filter that was implanted
9 in August of 2010. Did Bard have the technology and ability
10 to add caudal anchors onto Bard's filters that was ultimately
11 done with the Meridian project at that time?

12 A No, we did not.

13 Q And did Bard have the technology and ability to create a
14 filter completely out of Nitinol tubing like it did with the
15 Denali filter in 2010?

16 A No, we did not.

17 Q Mr. Randall, the jury has heard at various points in the
18 trial about a cascade of events. And is that something that
19 you have heard of in the engineering world?

20 A No, I have not. The only time I've ever heard it is
21 preparing for this case.

22 Q And when -- at certain points in time did Bard look to see
23 whether there was potentially some interrelatedness between
24 various failure modes like tilt, perforation, and fracture?

25 A Yes, we did.

C E R T I F I C A T E

I, PATRICIA LYONS, do hereby certify that I am duly appointed and qualified to act as Official Court Reporter for the United States District Court for the District of Arizona.

I FURTHER CERTIFY that the foregoing pages constitute a full, true, and accurate transcript of all of that portion of the proceedings contained herein, had in the above-entitled cause on the date specified therein, and that said transcript was prepared under my direction and control, and to the best of my ability.

DATED at Phoenix, Arizona, this 30th day of May, 2018.

s/ Patricia Lyons, RMR, CRR
Official Court Reporter